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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HANS MENOS, derivatively on behalf of
ECO SCIENCE SOLUTIONS, INC.,

Plaintiff,

v.

JEFFERY L. TAYLOR, DON L.
TAYLOR, L. JOHN LEWIS, S.
RANDALL OVESON, and GANNON
GIGUIERE,

Defendants,

and

ECO SCIENCE SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-CV-00662-LRH-CBC

STIPULATION AND
ORDER REGARDING THE FILING OF
AN AMENDED COMPLAINT AND
SCHEDULE FOR RESPONSE
THERE TO

(First Request)

1 **STIPULATION REGARDING THE FILING OF AN AMENDED COMPLAINT AND**
2 **SCHEDULE FOR RESPONSE THERETO**

3 Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1, and Fed. R. Civ. P. 15(a)(2), Plaintiff Hans
4 Menos (“Plaintiff”), by and through his counsel the law firms of Leverty & Associates Law Chtd.
5 Ltd. and The Rosen Law Firm, P.A. and Defendants Jeffery L. Taylor, Don L. Taylor, L. John
6 Lewis, S. Randall Oveson and Gannon Giguere (collectively, “Individual Defendants”) and
7 Nominal Defendant Eco Science Solutions, Inc. (“Nominal Defendant” and with Individual
8 Defendants, “Defendants”), by and through their counsel, the law firm of Greenberg Traurig, LLP,
9 hereby stipulate and agree that in lieu of responding to Defendants’ Motion to Dismiss Verified
10 Stockholder Derivative Complaint (“Motion to Dismiss”) (Dkt. No. 42), Plaintiff will file an
11 amended complaint on or before December 21, 2018.

12 Currently, the deadline for Plaintiff to file an opposition to Defendants’ Motion to Dismiss
13 is November 26, 2018. While preparing a response to Defendants’ Motion to Dismiss, Plaintiff
14 has determined it would be productive, as well as conserve party and judicial resources, to file an
15 amended complaint instead of a response as new public information has been made available to
16 Plaintiff since the filing of the initial complaint. Defendants’ counsel has agreed to the filing of an
17 amended complaint on or before December 21, 2018.

18 If the Court permits the filing of the amended complaint on or before December 21, 2018,
19 the Parties agree that Defendants will have forty-five (45) days to respond to the amended
20 complaint. If a motion to dismiss is filed, Plaintiff shall have forty-five (45) days after the filing
21 of a motion to dismiss to file an opposition and Defendants shall have thirty (30) days after the
22 filing of Plaintiff’s opposition to file a reply.

23 This is the first stipulation for the scheduling of the filing of an amended complaint and
24 response thereto. The Court previously granted Plaintiff’s agreed-upon request for an an extension
25 of time to respond to the Motion to Dismiss.

26 Dated: November 16, 2018

27 By: /s/Patrick R. Leverty
28 Patrick R. Leverty
 LEVERTY & ASSOCIATES LAW CHTD.
 832 Willow Street
 Reno, NV 89502

1 Phillip Kim
2 THE ROSEN LAW FIRM, P.A.
3 275 Madison Avenue, 34th Floor
4 New York, NY 10016

5 *Attorneys for Plaintiff*

6
7 Dated: November 16, 2018

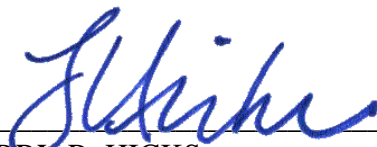
8 By: /s/Joel M. Eads
9 Mark E. Ferrario
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16 GREENBERG TRAURIG, LLP
17 2700 Two Commerce Square
18 2001 Market Street
19 Philadelphia, PA 19103

20 *Attorneys for Defendants and Nominal*
21 *Defendant*

22 **IT IS SO ORDERED:**

23 DATED this 20th day of November, 2018.

24 
25 _____
26 LARRY R. HICKS
27 UNITED STATES DISTRICT JUDGE
28